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April 4, 1996

OUR FILE NO.
25101.74560

RECEIVED

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VIA MESSENGER

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street, N.W.
Room 222
Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

Re: WT Docket No. 96-18

Dear Mr. Caton:

On April 4, 1996, Kathleen Abernathy and Carl Northrop, both representing AirTouch Paging, met with Jennifer Warren, Assistant Deputy from the Wireless Telecommunications Bureau, to discuss the interim licensing procedures under consideration in the above-referenced proceeding regarding the transition to a geographic area licensing scheme for paging services.

The AirTouch Paging representatives indicated that there are multiple bases on which to distinguish the paging industry from other segments of the communications industry which have been subjected to freezes, and that the differences permit the Commission to relax the paging freeze on a principled basis. We recommended, consistent with the written comments in which AirTouch Paging participated,^{1/} that the freeze be relaxed in order to allow existing

^{1/} See Joint Comments and Joint Reply Comments of AACCS, AirTouch Paging et al. filed March 1, 1996 and March 11, 1996, respectively.

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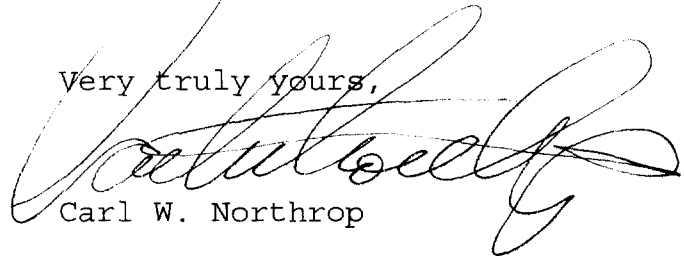
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systems to expand into contiguous areas to meet changing public demands. The AirTouch Paging representatives further indicated that the narrowly tailored relief from the freeze they advocated would not encourage application fraud which was a subject of concern in written comments of the FTC.

A hand-out distinguishing the paging freeze from other freezes was distributed. A copy is attached.

Kindly refer any questions in connection with this matter to the undersigned.

Very truly yours,

A handwritten signature in black ink, appearing to read 'Carl W. Northrop', is written over the typed name. The signature is fluid and cursive, with a large loop at the end.

Carl W. Northrop

Enclosure

cc: Jennifer Warren

DISTINGUISHING THE PAGING FREEZE FROM OTHER FREEZES

	Paging	800 MHz SMR	900 MHz SMR	220 MHz	39 GHz	MMDS
Is there prior FCC precedent lifting freezes affecting the channels based upon public interest findings?	Yes	No	No	No	No	No
Was the affected industry in the midst of a period of sustained growth at the time of the freeze?	Yes	No	No	No	No	No
Did the rules in place when the freeze was adopted already contemplate the use of auctions?	Yes*	No	No	No	No	No
Was the freeze adopted as part of a major revision of the rules in addition to a change to market area licensing?	No	Yes	Yes	Yes	Yes	Yes
Does the freeze affect a mature industry found by the Commission to be highly competitive?	Yes	No	No	No	No	No
Does the freeze apply to all categories of licensees equally?	No	Yes	Yes	No	Yes	Yes
Do system expansions into new territory occur on an incremental basis?	Yes	No	No	?	No	No
Are the rule changes under consideration during the freeze necessary to foster competitive equality?	No	Yes	?	No	Yes	Yes
Were rule changes being made to replace a first-come, first served licensing scheme?	No*	Yes	Yes	Yes	No	No
Was application processing at a virtual standstill when the freeze was imposed?	No	Yes	No	Yes	Yes	Yes

* Part 22 only